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July 18, 2014

VIA ECF


Hon. Alvin K. Hellerstein  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Vera v. Republic of Cuba, No. 12-cv-01596-AKH  
Objection of Banco Bilbao Vizcaya Argentaria, S.A.,  
BBVA Bancomer, and BBVA Colombia S.A.

Dear Judge Hellerstein:

We represent Banco Bilbao Vizcaya Argentaria, S.A., BBVA Bancomer, and BBVA Colombia S.A. (collectively "BBVA"), in the above-captioned proceeding. We write to inform you that BBVA will not be making a claim to the blocked assets described in (1) Notice to BBVA Colombia S.A. (formerly Banco Ganadero), (2) Notice to Banca Promex S.A.,<sup>1</sup> and (3) Notice to BBVA S.A., London Branch, each dated March 31, 2013. BBVA does, however, object to the turnover of the blocked assets on the ground that the Court lacks subject matter jurisdiction over this proceeding and incorporates by reference the submissions on BBVA's motion to dismiss, Docket Nos. 349-351, 360-364, and 377.

Respectfully submitted,



Kenneth A. Caruso

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<sup>1</sup> Banca Promex S.A. is currently BBVA Bancomer.